From: PETERSON Jenn L
To: Eric Blischke/R10/USEPA/US@EPA
Subject: FW: PCBs and carp for rd 1
Date: 12/10/2007 12:26 PM

More info...

-----Original Message-----
From: Jeremy_Buck@fws.gov [mailto:Jeremy_Buck@fws.gov]
Sent: Wednesday, December 05, 2007 6:13 PM
To: PETERSON Jenn L; Goulet.Joe@epamail.epa.gov
Subject: PCBs and carp for rd 1

As you scroll down the list of whole body carp, you will notice that essentially only Aroclor 1260 was detected, which is odd because typically 1254 shows in tissues (and the extremely variable detection limits for 1254 indicates the data for 1254 is not reliable). But, at least we have 1260 (if that is even reliable). So, the question becomes, what did they use to represent exposure to wildlife for total PCBs in carp (or other fish)? the 1260 value of 6.5 ppm is above the highest values for fish we have seen in this area for total PCBs (QM could confirm this) and if they used this number (or the 1.1 ppm value), it seems most things eating carp would have elevated LOAEL HQs (but this wasn't the case with eagles or osprey for total PCBs -see table 5-68). I forget, did they use historic carp data to also calculate HQs, or just the round 1 data? Most seriously, they collected 3 carp from each area as if the carp would be replicates within the area, and with the theory that a wide ranging fish would have similar concentrations. The spread in the 1260 data CLEARLY shows this is not the case, and we don't know where the carp came from so we can't do a good "walk through" evaluation of osprey or eagles with carp in a risk scenario. Hopefully our new carp data will help this out, but Jennifer is now getting really mad at me because I didn't review this stuff BEFORE the data gaps recommendations.... :(

Also, in their RISK database as copied below, which apparently is the one they used to make risk decisions, they ended up averaging field replicates (so the data for carp would have slightly different results in QM compared to the risk database). Interesting that this simple QA check captured the difference for DDE. MAY not be a big deal, but we shouldn't expect our 95% UCLs or even max values calculated with QM to match theirs. This is likely a result of adapting the data rules through the process. If you want, you can check what QM gives you to what I put below (which is directly out of their risk database (FR=field replicate, T=averaged value, N=normal sample). Maybe this was only was for DDE because of the weird results initially.

SampleID	Species	Tissue	detect_flag	VALUE	Qualifiers	Units	RiverMile	SampleType	Analyte
LWG01FZ0609TSCPWBC10	carp	whole body	N	44	U	ug/kg	7.98	N	Aroclor 1016
LWG01FZ0306TSCPWBC30	carp	whole body	N	9.5	U	ug/kg	4.14	FR	Aroclor 1016
LWG01FZ0609TSCPWBC30	carp	whole body	N	53	U	ug/kg	7.98	FR	Aroclor 1016
LWG01FZ0306TSCPWBC20	carp	whole body	N	470	U	ug/kg	4.14	FR	Aroclor 1016
LWG01FZ0609TSCPWBC20	carp	whole body	N	38	U	ug/kg	7.98	FR	Aroclor 1016
LWG01FZ0306TSCPWBC10	carp	whole body	N	9.5	U	ug/kg	4.14	N	Aroclor 1016

LWG01FZ0306TSCPWBC20FR	carp	whole body	N	390	U	ug/kg	4.14	Aroclor 1221
LWG01FZ0609TSCPWBC10N	carp	whole body	N	80	U	ug/kg	7.98	Aroclor 1221
LWG01FZ0609TSCPWBC20FR	carp	whole body	N	38	U	ug/kg	7.98	Aroclor 1221
LWG01FZ0609TSCPWBC30FR	carp	whole body	N	79	U	ug/kg	7.98	Aroclor 1221
LWG01FZ0306TSCPWBC10N	carp	whole body	N	9.5	U	ug/kg	4.14	Aroclor 1221
LWG01FZ0306TSCPWBC30FR	carp	whole body	N	9.5	U	ug/kg	4.14	Aroclor 1221
LWG01FZ0306TSCPWBC20FR	carp	whole body	N	550	U	ug/kg	4.14	Aroclor 1232
LWG01FZ0609TSCPWBC10N	carp	whole body	N	70	U	ug/kg	7.98	Aroclor 1232
LWG01FZ0306TSCPWBC30FR	carp	whole body	N	9.5	U	ug/kg	4.14	Aroclor 1232
LWG01FZ0609TSCPWBC20FR	carp	whole body	N	38	U	ug/kg	7.98	Aroclor 1232
LWG01FZ0306TSCPWBC10N	carp	whole body	N	9.5	U	ug/kg	4.14	Aroclor 1232
LWG01FZ0609TSCPWBC30FR	carp	whole body	N	110	U	ug/kg	7.98	Aroclor 1232
LWG01FZ0609TSCPWBC30FR	carp	whole body	N	76	U	ug/kg	7.98	Aroclor 1242
LWG01FZ0306TSCPWBC20FR	carp	whole body	N	630	UJ	ug/kg	4.14	Aroclor 1242
LWG01FZ0306TSCPWBC10N	carp	whole body	N	9.5	U	ug/kg	4.14	Aroclor 1242
LWG01FZ0609TSCPWBC10N	carp	whole body	N	63	U	ug/kg	7.98	Aroclor 1242
LWG01FZ0609TSCPWBC20FR	carp	whole body	N	38	U	ug/kg	7.98	Aroclor 1242
LWG01FZ0306TSCPWBC30FR	carp	whole body	N	9.5	U	ug/kg	4.14	Aroclor 1242
LWG01FZ0609TSCPWBC30FR	carp	whole body	N	180	U	ug/kg	7.98	Aroclor 1248
LWG01FZ0306TSCPWBC20FR	carp	whole body	N	730	UJ	ug/kg	4.14	Aroclor 1248
LWG01FZ0609TSCPWBC20FR	carp	whole body	Y	270		ug/kg	7.98	Aroclor 1248
LWG01FZ0306TSCPWBC10N	carp	whole body	Y	110		ug/kg	4.14	Aroclor 1248
LWG01FZ0306TSCPWBC30FR	carp	whole body	Y	60		ug/kg	4.14	Aroclor 1248
LWG01FZ0609TSCPWBC10N	carp	whole body	N	160	U	ug/kg	7.98	Aroclor 1248
LWG01FZ0609TSCPWBC20	carp	whole body	N	610	U	ug/kg	7.98	

FR Aroclor 1254							
LWG01FZ0306TSCPWBC30	carp	whole body	N	140	U	ug/kg	4.14
FR Aroclor 1254							
LWG01FZ0306TSCPWBC20	carp	whole body	N	5200	UJ	ug/kg	4.14
FR Aroclor 1254							
LWG01FZ0609TSCPWBC10	carp	whole body	N	510	U	ug/kg	7.98
N Aroclor 1254							
LWG01FZ0609TSCPWBC30	carp	whole body	N	750	U	ug/kg	7.98
FR Aroclor 1254							
LWG01FZ0306TSCPWBC10	carp	whole body	N	170	U	ug/kg	4.14
N Aroclor 1254							
LWG01FZ0306TSCPWBC30	**carp**	**whole body**	**Y**	**170**		**ug/kg**	**4.14**
FR Aroclor 1260							
LWG01FZ0306TSCPWBC20	**carp**	**whole body**	**Y**	**6500**	**J**	**ug/kg**	**4.14**
FR Aroclor 1260							
LWG01FZ0306TSCPWBC10	**carp**	**whole body**	**Y**	**190**		**ug/kg**	**4.14**
N Aroclor 1260							
LWG01FZ0609TSCPWBC10	**carp**	**whole body**	**Y**	**690**		**ug/kg**	**7.98**
N Aroclor 1260							
LWG01FZ0609TSCPWBC20	**carp**	**whole body**	**Y**	**740**		**ug/kg**	**7.98**
FR Aroclor 1260							
LWG01FZ0609TSCPWBC30	**carp**	**whole body**	**Y**	**1100**		**ug/kg**	**7.98**
FR Aroclor 1260							
LWG01FZ0609TSCPWBC10	carp	whole body	N	38	U	ug/kg	7.98
N Aroclor 1262							
LWG01FZ0306TSCPWBC10	carp	whole body	N	9.5	U	ug/kg	4.14
N Aroclor 1262							
LWG01FZ0306TSCPWBC30	carp	whole body	N	9.5	U	ug/kg	4.14
FR Aroclor 1262							
LWG01FZ0306TSCPWBC20	carp	whole body	N	190	UJ	ug/kg	4.14
FR Aroclor 1262							
LWG01FZ0609TSCPWBC20	carp	whole body	N	38	U	ug/kg	7.98
FR Aroclor 1262							
LWG01FZ0609TSCPWBC30	carp	whole body	N	19	U	ug/kg	7.98
FR Aroclor 1262							
LWG01FZ0609TSCPWBC20	carp	whole body	N	38	U	ug/kg	7.98
FR Aroclor 1268							
LWG01FZ0609TSCPWBC30	carp	whole body	N	19	U	ug/kg	7.98
FR Aroclor 1268							
LWG01FZ0306TSCPWBC30	carp	whole body	N	9.5	U	ug/kg	4.14
FR Aroclor 1268							
LWG01FZ0609TSCPWBC10	carp	whole body	N	38	U	ug/kg	7.98
N Aroclor 1268							
LWG01FZ0306TSCPWBC10	carp	whole body	N	9.5	U	ug/kg	4.14
N Aroclor 1268							
LWG01FZ0306TSCPWBC20	carp	whole body	N	190	UJ	ug/kg	4.14
FR Aroclor 1268							